

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

CARLO M. CROCE

Plaintiff,

vs.

SOTHEBY'S FINANCIAL SERVICES,
INC., *et al.*

Defendants.

Case No. 2:23-cv-02896

Judge Morrison

**DEFENDANTS' INITIAL
DISCLOSURES**

DEFENDANTS' INITIAL DISCLOSURES

Now come Defendants Sotheby's Inc., and Sotheby's Financial Services, Inc., by and through counsel, and hereby submit their Initial Disclosures pursuant to Federal Rule of Civil Procedure ("Civil Rule") 26 and this Court's orders.

Introductory Statement

Defendants reserve the right to supplement, either through responses to formal discovery, in accordance with the Court's scheduling order, the Federal Rules of Civil Procedure, or informally, the information contained in this initial disclosure, if necessary and appropriate.

I. INDIVIDUALS

Plaintiffs believe the following individuals are likely to have discoverable information related to the claims and defenses of the parties in this case:

1. Carlo Croce ("Plaintiff" or "Croce");
2. Daria Foner;
3. Christopher Apostle;

4. Corporate representative of Kegler Brown Hill & Ritter Co. LPA;
5. Corporate representative of James E. Arnold & Associates;
6. Any and all witnesses identified by Plaintiff in his initial disclosures or identified during discovery; and
7. Any and all witnesses identified as discovery proceeds which are not identified here or in Plaintiff's initial disclosures.

II. DOCUMENTS

The following documents and tangible things may be used to support the defenses of Defendants:

1. Documents attached to the Complaint or Amended Complaint in this case, or to the briefing by Defendants in this case;
2. Documents and decisions or orders in the cases in Franklin County related to the dispute between Croce and Kegler Brown Hill & Ritter Co. LPA, James E. Arnold & Associates, and or the Ohio State University Board of Trustees;
3. Documents and decisions or orders in any case where Croce sued any person or entity for defamation;
4. Communications between Croce and Defendants or Defendants' agents;
5. Communications and documents related to the authenticity and valuation of Croce's artwork; and
6. Any and all documents identified by Plaintiff in his initial disclosures;

Defendants reserve the right to supplement this list as discovery and additional investigation warrants.

III. DAMAGES

Not applicable.

IV. INSURANCE COVERAGE

Not applicable.

Respectfully submitted,

/s/ Zachary C. Schaengold
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Attorneys for Defendants

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing has been electronically filed this 15th day of May, 2024. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's CM/ECF system.

/s/ Zachary C. Schaengold
Zachary C. Schaengold